



SDMS DocID

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**New England Telephone**A **NYNEX** Company245 State Street
Boston, Massachusetts 02109**Real Estate Operations**

February 15, 1991

Steven J. Calder, Remedial Project Manager
U.S. Environmental Protection Agency
P.O. Box 5988
J. F. Kennedy Station
Boston, MA 02114

Superfund Records Center

SITE: CoakleyBREAK: 119OTHER: 559821

RE: Request for Information for Coakley
Landfill in North Hampton, New Hampshire

Dear Mr. Calder:

On January 8, 1991, New England Telephone and Telegraph Company (NET) provided a preliminary response to the Environmental Protection Agency's (EPA) request for information pursuant to Section 104 of CERCLA and Section 3007 of RCRA, for Coakley Landfill (the "Site"). Prior to its submission of the January 8, 1991 response, NET requested and received permission to file an additional response from EPA counsel Cynthia Catri. This response represents the additional data assembled by NET. NET reserves its rights to supplement substantially its responses to this information request to the extent that additional information becomes available during its ongoing investigation.

ANSWERS TO SPECIFIC QUESTIONSA. GENERAL INFORMATION

1. Susan Battistelli, Environmental Staff Director
Real Estate Operations
245 State Street
Boston, MA 02109

2. In addition to the documents previously produced, NET examined its Mechanized Accounts Payable database and the manual predecessor to the database, to determine if NET conducted any business with the generators listed in question 22. The database contains records of transactions between NET and its vendors. The search indicated that NET did not conduct business with any of the generators listed during the relevant time period. NET cannot produce and objects to the production of the database on the

basis of its enormous size and its lack of relevancy.

3. NET initiated its investigation pursuant to this request by contacting representatives from each NET department which has responsibility for operations in New Hampshire. The following is a list of all persons who have been interviewed since NET's last report. All interviewees were queried as to their personal knowledge, the existence and location of documents and the identity of other employees or non-employees who may have additional knowledge.

Gary Schmitz, Manager - Motor Vehicles
101 Huntington Avenue, Boston, MA

Joseph Cronin, Manager - Motor Vehicles
1228 Elm Street, Manchester, NH

Dick Elwell, Equipment Mechanic - Real Estate Operations
100 Gay Street, Manchester, NH

Rick Burns, Equipment Mechanic - Real Estate Operations
100 Gay Street, Manchester, NH

Patty Bastianelli, Area Operations Manager - Real Estate Operations, 100 Gay Street, Manchester, NH

Kevin McDonough, Environmental Manager - Real Estate Operations, 245 State Street, Boston, MA

Norm Harrison, Area Operations Manager - Real Estate Operations, 100 Gay Street, Manchester, NH

Charlie O'Donoghue, Building Manager - Real Estate Operations, 100 Gay Street, Manchester, NH

Jenny Hickman, Manager's Clerk - Customer Services
Tri City Road, Somersworth, NH

Pat Spencer, Engineer - Network Services
1228 Elm Street, Manchester, NH

Frank Pomerleau, Engineer - Network Services
1228 Elm Street, Manchester, NH

Helen Carter, Clerical Assistant - Finance & Comptroller
125 High Street, Boston, MA

a. NET has no such records.

b. NET has no knowledge of such persons.

4. NET is not aware of any documents not in its possession, custody or control which are responsive to this information request.

B. FINANCIAL/CORPORATE INFORMATION

6. Per the request of EPA counsel Cynthia Catri, NET has focused its investigation on the following NET facilities, referred to generally as "the Locations". NET provides its response to question 6 by grouping the Locations into the following categories:

1. Garage Locations

Customer Services Garage, RT. 101, Greenland, Portsmouth, NH; and

Customer Services Garage, 10 Tri City Road, Somersworth, NH.

2. Central Office Locations

Central Office and Residence Service Center, 56 Islington Street, Portsmouth, NH; and

Central Office, 57 St. Thomas Street, Dover, NH.

3. SLC and Tower Locations

SLC Mini Hut, Bayside Road, Greenland, Portsmouth, NH; and

Tower, 56 Islington Street, Portsmouth, NH.

By way of background, NET is not and has never been engaged in the manufacturing process at any of the Locations. At the relevant Locations, and in general, NET provides local exchange, intraLATA and access telecommunications services. NET "repair" processes involve the operation of the public switched telecommunications network in the territories in which it operates.

1. Garage Locations

a. Addresses are listed above.

b. The garage in Greenland has been in operation from 1975 until the present. The Somersworth garage was in operation throughout the relevant time period.

c. At these NET garage locations, NET garages and services motor vehicles used by its Customer Services technicians. The Customer Services technicians are employees who interface directly with customers at their residence or business. They are responsible for hooking up the customer to NET's telecommunications network so that the customer can both originate and receive voice and data transmission at its premise.

The Customer Services technicians also build the telecommunications network. They are responsible for installing new telephone cable to ensure that the telecommunications network

is accessible to and has sufficient capacity for all customers, regardless of their location.

The activities which occur at the two garage locations include, but are not limited to:

- a. overnight storage of vehicles;
 - b. maintenance of vehicles - oil changes, tune-ups, etc.;
 - c. general administration of Customer Services work force - dispatching of workforce and other managerial functions, etc.; and
 - d. storage of wire, cable and other materials used in the construction and maintenance of telecommunications equipment.
- d. At the garage locations NET uses materials which would commonly be found at any facility that services motor vehicles - gasoline, oil, batteries, etc. In addition, the garage locations also utilize non-hazardous materials which are similar to the materials found in any commercial office building. MSDSs were provided with the January 8, 1991 preliminary report.
- e. The Customer Services garages accumulate scrap wire, waste oil, used batteries, and ordinary trash and rubbish. NET's disposal practices are described in answer to question 28.

2. Central Office Locations

- a. Addresses are listed above.
- b. All Central Office locations were in operation during the relevant period.
- c. The NET Central Offices house sophisticated telephone switching computers which provide telecommunications service to business and residence customers in the Portsmouth and Dover areas. The primary activities which NET conducts at these locations are the maintenance and growth of the Central Office equipment to provide uninterrupted telephone service to all customers.

In Portsmouth, a Customer Services Residence Service Center (RSC) is located in the same building as the Central Office. The RSC employees perform customer service functions and answer service and billing inquiries generated by NET customers in the Portsmouth area.

- d. At the Central Office locations NET uses sulfuric acid batteries to provide power to the telephone switching equipment. NET also uses petroleum products to heat the facilities and to serve as fuel for the backup generators which power the telephone equipment in the event of commercial power failure. The RSC uses materials common to commercial type offices.

e. NET was not and never has been a generator of hazardous waste. Certain components of telephone switching equipment such as the equipment located at NET's Central Offices on Islington Street and St. Thomas Street, contain relays, vapor tubes and batteries which contain minute quantities of substances which may be considered hazardous. This equipment, however, when retired maintains value and is sold. In addition to the telephone equipment, NET's central office facilities generate ordinary trash and rubbish. The RSC also generates ordinary trash and rubbish. NET's disposal practices are described in answer to question 28.

3. SLC Mini Hut and Tower Locations

a. Addresses are listed above.

b. The SLC Mini Hut facility and the Tower facility were in operation during the relevant period.

c. A SLC Mini Hut is a small building located in a community which contains telephone equipment similar to that contained in a Central Office. The Tower facility on top of NET's Islington Street building facilitates radio and microwave telecommunications.

d. The SLC Hut contains electronic telecommunications equipment that is connected to both the customer's premise and to NET's Central Office equipment. The Tower is a metal structure which has radio antennas and microwave receivers and transmitters attached to it.

e. The SLC Mini Hut and the Tower do not generate any waste. They are both unattended facilities. NET personnel enter these facilities only to repair trouble conditions.

16. As previously stated, NET is a self-insurer with primary coverage of at least \$1 million dollars and in some years ranging up to \$2.5 million dollars. These policies do contain pollution exclusion clauses and cover sudden and accidental events. Excess policies prior to the time of divestiture are in the possession of AT&T. Environmental coverage is the subject of pending litigation. The policies are being forwarded under separate cover.

C. TRANSPORTER QUESTIONS

18. NET provided EPA with its EPA/RCRA identification numbers in its January 8, 1991 response. None of these numbers involve transport of materials to the Site.

19. NET is not aware that it or any of its agents ever transported materials to the Site. NET is not a transporter.

20. Not Applicable

21. Not Applicable

D. GENERATOR QUESTIONS

22. NET has no information, either by way of record or interview, that any of the parties with which NET contracted conducted business with any of the generators listed or that NET disposed of or arranged for the disposal of any materials at the Coakley Landfill Site at any time between 1970 and 1985. To the extent that the EPA has any information to the contrary, NET requests that the EPA provide it with that information.

23. Not Applicable

24. Not Applicable

25. NET did not have a permit number which permitted it to access the Site. In addition, NET has no knowledge of any users or permit user numbers of the Site.

E. DISPOSAL PRACTICES

26. NET's Corporate Services - Real Estate Operations department is responsible for the maintenance of the NET Locations including contracting with solid waste contractors to remove ordinary trash and rubbish. NET's Network Services department is responsible for the operation and maintenance of telecommunications equipment in Central Offices, SLC Huts and Towers. NET's Customer Services and Corporate Services - Motor Vehicles departments are responsible for the operation and maintenance of the NET garages.

27. NET has no knowledge of any acts or omissions of any persons which may have caused the release or threat of release of hazardous substances at the Site.

28. At NET's Central Office facilities, in Portsmouth and Dover, N.H., for the majority of the relevant time period, NET did not conduct any activity which would generate hazardous waste. However, in June, 1982 in Portsmouth and in December, 1984 in Dover, NET replaced an older generation of telephone switching equipment with a newer generation of equipment. Many of the component parts of the removed telephone equipment retained value when retired and therefore were sold to recyclers. Prior to NET's divestiture from AT&T in 1984, relays, vapor tubes, batteries, scrap metal and scrap wire were forwarded to Nassau Smelting, Co., an affiliate of Western Electric Co., or another recycler in the New England area. Some of the recyclers included:

A.J. Bear
95 Broadway, Dover NH

Bob's Used Parts and Salvage (Bob's Salvage)
Rte. 111A Brentwood, NH

B. Rovner Co.
No. Turner St., Manchester, NH

Buxton Service
514 Great Road, Acton, MA 01720

Minichello Brothers
Glen Hill Road, Dover, NH 03820

Dac Marine Co.
14 Spofford Ave., Warwick, RI

George Woll Co.
Kingston Rd., Exeter, NH

Gloucester Iron and Metal, Inc.
Brick & Stinsman Streets., Gloucester City, NJ

Hamilton Waste
62 Hamilton St., Manchester, NH

Harding Metals
Rte. 4 Northwood, NH

Industrial Smelting, Inc.
50 Sevinon Rd., Marblehead, MA

Louis Mack Co.
750 Warren Ave., Portland, ME

Merrimack Industrial Metals
Milford Rd., So. Merrimack, NH

Nassau Smelting
Gaston, So. Carolina

S. J. Phillips and Son
Court St., Exeter, NH

Scrap Metals Inc.
East Gleenwood St., Nashua, NH

From the mid-seventies to the present, batteries were sold to General Battery of Philadelphia, PA.

At NET's garage facilities, scrap wire was segregated by type into containers and because of its inherent value, was sold to recyclers. The waste oil generated by the motor vehicle fleet was either sold to various entities for reuse or recycled. The following list represents parties who purchased waste oil for the purpose of reuse or recycling:

William Rose Farm
Madbury, NH

Elliot Rose Flower Shop
Dover, NH

Beede Oil Company
Plaistow, NH

Both the William Rose Farm and the Elliot Rose Flower Shop used the waste oil to heat greenhouses.

Used motor vehicle batteries were sold to Gem Auto of East Boston, MA or Cohen Scrap Metal of Boston, MA.

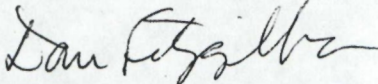
Essentially, the materials which NET used which might be considered hazardous, maintained value after NET terminated its own use and were sold to parties who continued to use them or who could recycle them.

Finally, at the garage and Central Office locations, NET contracted with solid waste contractors for the removal of ordinary trash and rubbish. Despite a diligent search of NET's Mechanized Accounts Payable database and interviews with former and present Real Estate Operations personnel, NET has not been able to identify which solid waste contractors NET employed during the relevant period.

29. Not Applicable

Should you have further questions please contact my counsel, Bartlett Thomas at (617) 743-4433. Thank you for your attention to this matter.

Very truly yours,



for Susan Battistelli
Environmental Staff Director

X:coakley